

Joint Rule 26(f) Discovery Plan

The motion to consolidate this action caused a delay in Plaintiff's Rule 26(a)(1) disclosures, which have now been served. Plaintiff would ask this Court to consider these disclosures timely served (the proposed Amended Scheduling Order reflects this change).

(B) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues:

The parties have agreed that any necessary discovery can be completed within the deadlines imposed by the Federal Rules of Civil Procedure, the Local Rules, and the current Scheduling Order (Entry 10). Such discovery is expected to focus generally on the issues raised in Plaintiff's Complaint and in the Defendant's Answer.

However, Defendants' attorney has potential trial in the near term in the companion "Doe" cases (Jane Doe-3 v. Horry County, SC, et al; C/A No. 4:16-cv-02576-MGL and Jane Doe-4 v. Horry County, SC, et al; C/A No. 4:16-cv-03136-MGL). These trials could affect the current deadlines and require their extension.

(C) Any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced;

None at this time.

(D) Any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502;

None at this time.

(E) What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed:

The Parties anticipate filing a Consent Confidentiality Order in the standard form used by this District.

(F) Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c):

None at this time.

Dated: 03/15/19

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